

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

|                                 |   |                       |
|---------------------------------|---|-----------------------|
| In re                           | : | Chapter 11            |
|                                 | : |                       |
| W.R. Grace & Co., <i>et al.</i> | : | Case No. 01-01139 JKF |
|                                 | : |                       |
| Debtors.                        | : |                       |

**CERTAIN PLAN OBJECTORS' NOTICE OF DESIGNATIONS  
FOR PHASE II OF THE CONFIRMATION HEARING  
WITH RESPECT TO THE DEPOSITION OF JAY HUGHES**

The undersigned parties (collectively, "Certain Plan Objectors"), by and through their respective undersigned attorneys, hereby designate the attached excerpts from the transcript of the deposition of Jay Hughes, taken on June 11, 2009 (the "Deposition Transcript"), together with any pertinent exhibits thereto, which may be offered in evidence in connection with Phase II of the Confirmation Hearing in this matter, pursuant to Rule 32 of the Federal Rules of Civil Procedure. Certain Plan Objectors reserve the right to supplement these designations following receipt of Plan Proponents' counter-designations, if any. Certain Plan Objectors further reserve the right to use any part of the Deposition Transcript, even if it is not designated, for the purpose of contradicting or impeaching testimony given by the deponent as a witness. Finally, Certain Plan Objectors reserve the right to call the witness at trial to supplement the deposition testimony designated herein.

An excerpted copy of the Deposition Transcript, together with pertinent exhibits, is attached as Exhibit "A" hereto, with the portions designated by Certain Plan Objectors marked in green.

Dated: August 14, 2009  
Wilmington, Delaware

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